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TRACY HOPE DAVIS

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:

MARGARET LESLIE CANTLON,

Debtor(s).

Case No: 15-50292-gwz

Chapter 11

Date: December 14, 2023
Time: 10:00 a.m.

**DECLARATION OF KRISTINE R. KINNE IN SUPPORT OF MOTION
OF THE UNITED STATES TRUSTEE, PURSUANT TO 11 U.S.C. § 1112(b)
AND FEDERAL RULES OF BANKRUPTCY PROCEDURE
1017(f) AND 9014, TO DISMISS OR CONVERT CHAPTER 11 CASE**

I, Kristine R. Kinne, declare as follows:

1. I am employed as a Bankruptcy Analyst in the Reno, Nevada Office of the United States Trustee, Region 17 ("United States Trustee").

2. I am the Bankruptcy Analyst assigned to the above-captioned chapter 11 case. I have personal knowledge of the facts set forth herein. To the extent I base my testimony upon information and belief or upon admissible evidence other than my personal knowledge, I will specifically so state.

3. The United States Trustee is an official of the United States Department of Justice, charged by statute with the duty to oversee and supervise the administration of bankruptcy cases

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2 and take action to ensure that all reports, schedules, and fees required under Title 11 are properly
3 and timely filed pursuant to 28 U.S.C. § 586. As part of my duties as a Bankruptcy Analyst, I am
4 responsible for the supervision of chapter 11 cases in the Office of the United States Trustee,
5 Region 17. This supervision includes: monitoring chapter 11 cases; reviewing petitions,
6 schedules, statements and related documents, and pleadings filed by a chapter 11 debtor and
7 other parties in interest; conducting the Initial Debtor Interview and requesting documents related
8 to the Interview; reviewing pre-confirmation Monthly Operating Reports (“MORs”); reviewing
9 post-confirmation Quarterly Operating Reports (“PCRs”); monitoring plans and disclosure
10 statements; and other such other actions as the United States Trustee deems appropriate.
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13 4. This declaration is based upon facts of which I have personal knowledge, as well
14 as facts subject to judicial notice, such as filing dates, apparent from the court’s records in this
15 proceeding. This declaration is made in my official capacity as a representative of the United
16 States Trustee, without waiving the attorney client privilege or the work product privilege.
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18 5. Based upon my review of the Court’s official ECF docket in the above-captioned
19 case, I have determined that the above-captioned Reorganized Debtor (“Reorganized Debtor”)
20 has not filed one MOR for September 2018 and eleven PCRs for the first quarter of 2021 through
21 the third quarter of 2023. *See ECF Docket generally.*
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23 6. On November 16, 2023, I accessed the Chapter 11 Quarterly Fee Information and
24 Collection System (“FICS”), which calculates quarterly fees based on Reorganized Debtor’s
25 MOR and PCR disbursements.

26 7. I ran the current Account Reconciliation report, which reports estimated fees due
27 and unpaid of \$250.00.
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1 8. Because Reorganized Debtor has failed to file the above-referenced MOR and
2 PCRs, the United States Trustee cannot calculate the precise amount of quarterly fees due.
3 Reorganized Debtor's monthly and quarterly disbursements are required for this calculation and
4 are part of the information set forth in MORs and PCRs. The quarterly fees are estimated due to
5 Reorganized Debtor's failure to file MORs and PCRs for the quarters referenced herein.
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7 I declare under penalty of perjury that the foregoing statements are true and correct.

8 Executed in Reno, Nevada on November 16, 2023.

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10 /s/ Kristine R. Kinne
11 Kristine R. Kinne
12 Bankruptcy Analyst
13 for the United States Trustee
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